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8 **UNITED STATES DISTRICT COURT**
9 **IN AND FOR THE DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,)
11 Plaintiff,)
12 v.) Case No.: 2:23-mj-1096-BNW
13 VICTOR CHAVEZ ROSAS,)
14 Defendant.)
15 _____)
16 _____)

17 IT IS STIPULATED AND AGREED, by and between JASON M. FRIERSON,
18 United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the
19 United States of America, and Manuel O. Montelongo, Esquire, counsel for the defendant
20 Victor Chavez Rosas, that the above-captioned matter be closed.

21 This Stipulation is entered into based upon the following:

22 1. On or about February 21, 2024, defendant entered into a Petty Offense
23 Agreement with the United States in which he agreed to plead guilty to Count One of the
24 Complaint, Reckless Driving, in violation of 36 C.F.R. § 4.23(b), and N.R.S. § 484B.653(1).
25 See ECF No. 4.

26 2. The parties agreed to recommend that defendant be sentenced to one year of
27 unsupervised probation with the following special conditions: (i) pay a \$500.00 fine and a

1 mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court Counseling's (1)
2 DUI course and (2) Victim Impact Panel; (iii) complete an eight (8) hour online alcohol
3 awareness course; (iv) not return to Lake Mead National Recreation Area for a period of six
4 (6) months; and (v) not violate any local, state, or federal laws for a period of six (6) months.
5 If the defendant successfully completes his obligations within six months of unsupervised
6 probation, the court will allow the defendant to withdraw his guilty plea to count one and the
7 government will move to amend count one to Unsafe Operations.
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9 3. On February 21, 2024, this Court sentenced defendant pursuant to the parties'
10 plea agreement. *See* ECF No. 4.

11 4. Since commencing his term of unsupervised probation, defendant has
12 successfully completed conditions (i), (ii), (iii), and (iv).

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1 5. As such, the parties jointly request that the defendant be allowed to withdraw
2 her guilty plea to count one and the government moves to amend count one to Unsafe
3 Operations. The parties also jointly request that the above-captioned matter be closed.

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5 DATED this 12th day of September, 2024.

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7 Respectfully submitted,

8 JASON M. FRIERSON
9 United States Attorney

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11 _____
12 /s/ *Manuel O. Montelongo*
13 MANUEL O. MONTELONGO, ESQ.
14 Attorney for Defendant
15 **VICTOR CHAVEZ ROSAS**

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17 _____
18 /s/ *Skyler Pearson*
19 SKYLER PEARSON
20 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
VICTOR CHAVEZ ROSAS,
Defendant.

Case No.: 2:23-mj-1096-BNW

ORDER TO CLOSE THE CASE

VICTOR CHAVEZ ROSAS,

Defendant.

VICTOR CHAVEZ ROSAS,
Defendant.

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that: defendant has successfully completed the conditions of his sentencing.

ORDER

IT IS HEREBY ORDERED that the defendant is allowed to withdraw his guilty plea to count one and that the count one be amended to Unsafe Operations.

IT IS HEREBY ORDERED that the parties move the Court in the above-captioned matter case be closed, as all requirements have been completed.

DATED this 16 day of September, 2024

Berl Wexler
UNITED STATES MAGISTRATE JUDGE